1	KIRSTEN A. MILTON, ESQ.	
2	Nevada State Bar No. 14401  JACKSON LEWIS P.C.	
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6	Attorneys for Defendant ARCNV, Inc. d/b/a ARCCO ENTERPRISES	
7	UNITED STATES DISTICT COURT	
8	DISTRICT OF NEVADA	
9	ANGELETTA PAIGE, an individual, on	Case No. 2:25-cv-00954-CDS-DJA
10	behalf of herself and all others similarly situated,	
11	,	STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT TO
12	Plaintiff,	RESPOND TO PLAINTIFF'S COMPLAINT
13	VS.	COMI LAINI
14	ARCNV, INC. d/b/a ARCCO ENTERPRISES;	(SECOND REQUEST)
15	REGIS CORPORATION d/b/a SMARTSTYLES HAIR SALONS and DOES	
16	1-50, inclusive,	
17	Defendants.	
18	IT IS HEREBY STIPULATED by and between Plaintiff, ANGELETTA PAIGE	
19	("Plaintiff"), by and through her counsel, Rachel Mariner, Esq., of the law firm Rafii & Associates,	
20	P.C., and ARCNV, INC. d/b/a ARCCO ENTERPRISES by and through its counsel of record, the	
21	law firm Jackson Lewis P.C., hereby jointly stipulate and agree Defendant shall have an extension	
22	up to and including Monday, September 8, 2025, in which to file a response to Plaintiff's	
23	Complaint. This Stipulation is submitted and based upon the following:	
24	Defendants were initially served with the Summons and Complaint in this matter on	
25	Wednesday June 18, 2025, (ECF No. 1) making Defendant's response to Plaintiff's Complaint due	
26	on July 10, 2025.	
27	2. On July 9, 2025, the Parties subsequently stipulated to an extension of time, up to	

and including, Friday, August 8, 2025, for Defendant to respond to Plaintiff's Complaint (ECF No.

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12), which was granted by this Court (ECF No. 16).

- 3. Based upon and so as to facilitate ongoing settlement discussions between the Parties, they have agreed to further stipulate to an additional 30-day extension for Defendant to file its response to Plaintiff's Complaint through **Monday, September 8, 2025**.
- 4. The Parties have agreed to therefore extend the deadline for Plaintiff to file its response to Defendant's response, if a response is required, until **Monday September 8, 2025.**
- 5. The Parties have agreed to therefore extend the deadline for Defendant to file its reply, if a reply is required, until **Friday, September 26, 2025.**
- 6. This is the second stipulation to extend the time for Defendant to respond to Plaintiff's Complaint.
- 7. The Parties believe these circumstances constitute good cause for granting an extension. *See* Fed. R. Civ. P. 6(b)(1).
  - 8. This Stipulation is made in good faith and not for the purpose of delay.
- 9. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation and Order shall be construed as an admission of or consent to the merit or validity of any claim, defense, objection, or right by any party in this case.

Dated this 7th day of August, 2025.

RAFII & ASSOCIATES, P.C.

/s/ Rachel Mariner

Rachel Mariner, Bar No. 16728 1120 N. Town Center Dr., Suite 130

Las Vegas, Nevada 89144

Attorneys for Plaintiff ANGELETTA PAIGE JACKSON LEWIS P.C.

/s/ Kirsten Milton

Kirsten A. Milton, Bar No. 14401 300 S. Fourth Street, Suite 900 Las Vegas, Nevada 89101

Attorneys for Defendant ARCNV, Inc. d/b/a ARCCO ENTERPRISES

**ORDER** 

IT IS SO ORDERED:

DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

DATED: 8/8/2025

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